



Date: April 1, 2003
To: Illinois Commerce Commission Staff
From: SBC Illinois
Subject: April 1, 2003 SBC Illinois Report to ICC Staff on Key PMs

Issue: Key PMs Requiring Improvement – PM 17-01, Billing Completeness

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

1. An issue has been identified where performance on Lineshare orders for both SBC's Affiliate and for wholesale has been calculated from a different, later "available for Billing" date and time (the start of the interval calculation) than that used for UNE-P and Lineshare wholesale orders. As a result several days are excluded from the interval for those orders. For these orders, the date and time the order was "available for billing" in CABS has been used, instead of the date and time the order is "available for billing" in ACIS, which then encompasses the entire billing completion process (ACIS completion in addition to CABS completion).
 - This has resulted in overstated SBC Affiliate performance results, which are predominantly (greater than 90%) Linesharing, while Linesharing is a small subset of wholesale orders. Under the IL Remedy Plan, the parity comparison is made to the better of SBC Affiliate or SBC Retail, and in recent months that has resulted in the comparison being made to SBC Affiliate results, which have been overstated.
 - SBC Affiliate results in Illinois have consistently been reported as 98-99% bills posted before the first bill cycle for the account after the order is completed in the ordering systems. With the adjustment to use the proper start date and time from ACIS, SBC Affiliate results will be properly reported at a lower rate.
2. The UNE-P and Lineshare order process is serial, not parallel as in other regions.
 - The ACIS order must first "post-to-billing" (reach ACIS "3U" status) before the CABS order can be generated.
 - The interval for PM 17 is measured from "available for billing" in ACIS (ACIS "3C" status) to CABS posting.
 - The comparison is to either SBC Retail or the SBC Affiliate (SBC Affiliate order Lineshare only) for all order types.

(b) The corrective actions being taken for each of those PMs:

1. Programming corrections are being implemented to use the proper start date and time for calculation of the interval for wholesale and SBC Affiliate Linesharing orders. The anticipated reduction in reported performance for these orders is expected to impact SBC Affiliate results significantly, while having little to no obvious affect on reported wholesale results.
2. SBC has proposed in the current Billing PM Collaborative that a 5-day grace period for UNE-P and Lineshare orders be added to allow for the serial billing process implemented to address CLEC desires to have all UNE-P billing generated from CABS. With this change, if the first bill cycle after the order becomes "available for billing" is within five days, success will be assessed against the first bill cycle after the 5-day period. The order will not be marked a miss if it is completed in CABS prior to that bill cycle.

(c) The schedule for those corrective actions to be completed:

1. Implementation of the programming changes to use the proper start date and time for wholesale and SBC Affiliate orders will occur with March 2003 results and February 2003 results will be restated on April 7.
2. The proposed change to PM 17 version 1.9 is currently before the CLECs in the Billing PM Collaborative. SBC hopes to reach agreement on that proposal, along with the addition of a Billing Completion Notice Timeliness measure, within 30-45 days.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 17-01				
December	309154	93.15	98.47	No
January	354952	90.85	99.53	No
February	314750	91.13	99.88	No

Issue: Key PMs Requiring Improvement – PM 37-01, POTS Residence; PM 37-04, UNE-P Business

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

The primary cause for reported performance failing to meet the parity standard for both Resold POTS Residence and UNE-P Business trouble report rates is evident in the performance results for the same disaggregations of PM 37.1. PM 37.1 excludes repeat reports and installation reports, per agreement with the PM collaborative, and is the trouble report rate measure that is subject to remedy. SBC Illinois has consistently met the submeasures of PM 37.1. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of lines. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of lines, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.

Since the ratio of orders to installed lines is significantly higher for wholesale than SBC retail (see table below), it is expected that, assuming parity of installation trouble reports (which is the case; over the past three months all submeasures of PM 35 have been in parity except for one submeasure in one month (23 of 24 results in parity)), the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 37 than on SBC retail results.

<u>January 2003 Orders Volume versus Installed Base</u>			
	Order Count from PM 35	Installed Line Count from PM 37	Ratio Orders:Lines
POTS – Residence	6151	16232	0.379
Retail POTS Residence	267389	3325365	0.080
			ratio 4.7 times greater
UNE-P Business	4608	104911	0.044
Retail POTS Business	36283	2139198	0.017
			ratio 2.6 times greater

(b) The corrective actions being taken for each of those PMs:

Even though it is to be expected that installation trouble reports will be proportionately more common in wholesale results for PM 37 than in SBC Retail results, SBC Illinois is providing additional scrutiny to new wholesale service order requests. SBC Illinois will take wholesale service orders identified by the system as no fieldwork, and in key wire centers dispatch out on these orders on the due date early in the day. It is SBC Illinois' expectation that any bad plant condition/facility issues will be cleared on the due date. This preferential treatment for wholesale orders

is expected to help offset the expected, proportionately higher number of installation trouble reports included in PM 37, and bring performance closer to, or into, parity with SBC Retail.

(c) The schedule for those corrective actions to be completed:

The process described above was implemented in March 2003.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 37-01				
December	27295	1.80	1.80	Yes
January	16232	2.83	1.57	No
February	15976	2.94	1.64	No
PM 37-04				
December	100533	.69	.55	No
January	104911	.64	.61	Yes
February	107963	.62	.58	Yes

As a result of the "passing" performance results reported for the last two months, PM 37-04 will be dropped from this report effective with the next version to be provided to ICC Staff on May 1, 2003.

Issue: Key PMs Requiring Improvement – PM 55-01.1, 2-wire analog (1-10) and PM 55-01.3, 2-wire analog (20+)

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

PM 55 measures the average business days from application date to completion date for N, T, and C orders. The PM calls for a parity comparison in Illinois, while the other four SBC Midwest states use a benchmark comparison. An exclusion exists for customer requested due dates beyond the standard interval of “X” business days. However, because in Illinois this measure uses a parity standard, the wholesale exclusion for customer requested due dates beyond the standard interval can only be taken if the exclusion is also applied to retail comparisons. SBC Retail does not apply a standard interval in establishing order due dates, so the exclusion has not been applied.

Accordingly, reported results include all orders where the CLEC requested a due date beyond the standard interval defined for wholesale. This is because there is no corresponding standard interval for retail orders. When this measure is out of parity, it may simply show that the wholesale data was impacted by a higher percentage of orders with customer requested due dates outside of the 3 day offered interval, or with longer requested due dates, than SBC Retail. If the average installation interval measured in PM 55 was out of parity as a result of inadequate SBC performance, one would expect results for PM 58 (% SBC Caused Missed Due Dates) to also be out of parity. However, performance for the PM 58 submeasure 2-Wire Analog/8 dB Loops (1-10) for both January and February was within parity. Also, when SBC investigated the impact on only counting orders where the CLEC requested the standard offered interval for PM 55-01.1, the average installation interval dropped from 4.79 to 3.26 days for November data.

(b) The corrective actions being taken for each of those PMs:

For PM 55, an Enhancement Request (ER) is being issued to update the implementation to only include orders with requested due date of the standard interval on wholesale, and the offered interval (which varies based on force/load management) on SBC Retail.

(c) The schedule for those corrective actions to be completed:

The ER will be input to the Change Management process and prioritized appropriately.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 55-01.1				
December	2802	4.46 days	4.49	Yes
January	3404	5.41 days	4.38	No
February	2656	5.13 days	4.45	No
PM 55-01.3				
December	48	15.17	8.39	No
January	23	14	16.40	Yes
February	24	5	9.93	Yes

As a result of the “passing” performance results reported for the last two months, PM 55-01.3 will be dropped from this report effective with the next version to be provided to ICC Staff on May 1, 2003.

Issue: Key PMs Requiring Improvement – PM 65-03, Trouble Report Rate - DSL loops – line sharing; PM 65-06, Trouble Report Rate - BRI loop with test access; and PM 65-08, Trouble Report Rate - DS1 loop with test access.

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

A primary cause for reported performance for PM 65 – Trouble Report Rate submeasures for DSL Loops with Line Sharing, BRI Loops and DS1 Loops that differs from the results reported for the same submeasures of PM 65.1 is that PM 65.1 excludes repeat reports and installation reports. Per agreement with the PM collaborative PM 65.1 is the trouble report rate measure that is subject to remedy. SBC Illinois has determined it should be expected that CLECs would experience a higher trouble report rate than SBC retail when including I-cases in the results due to the ratio of orders (the base on which an installation trouble report can be reported) to the installed base of circuits. In essence, CLECs are generating proportionately more service orders than SBC Retail when contrasted to the current installed base of circuits, and therefore a proportionately higher rate of installation trouble reports (when compared to installed base) is expected to impact the trouble report rate measure.

Since the ratio of orders to installed lines is significantly higher for wholesale than SBC Retail (see example for BRI loops in the table below), it is expected that, assuming parity of installation trouble reports (which is the case; over the past three months the BRI Loop submeasure of PM 59 has been in parity each month), the number of installation trouble reports would be proportionately larger for wholesale compared to SBC retail when all other factors are held constant. It is important to understand that, while SBC is working to manage the incidence of installation trouble reports to the lowest level reasonable, the ratio of order volume to installed base of lines (significantly greater for wholesale than SBC Retail) is expected to result in a proportionately greater number of installation trouble reports, and hence a greater impact on wholesale results for PM 65 submeasures than for the SBC Retail comparison.

<u>January 2003 Orders Volume versus Installed Base</u>			
	Order Count from PM 59	Installed Circuit Count from PM 65	Ratio Circuits:Lines
UNE BRI Loops	329	10137	0.032
Retail ISDN BRI	364	72056	0.005
			ratio 6.4 times greater

(b) The corrective actions being taken for each of those PMs:

PM 65-03 BRI loop with test access: Even though the issue described above impacts these results, SBC Illinois has taken corrective action to reduce the trouble report rate by focusing on both the provisioning and maintenance process. A team has been set up to evaluate troubles caused by improper installations (I-cases) with emphasis placed on identifying deviations from existing methods and procedures.

PM 65-06 DSL loops – line sharing: For the November results posted on December 20, 2002 corrective action to change the PM implementation was taken: the data sourcing was corrected and the results were subsequently restated for the months June thru October 2002. After review of the results in December, the network teams had a clear vision on the level of disparity and are working to improve performance in the following ways:

- Weekly conference calls with the management team on repair commitment performance

- New daily reports showing performance levels on the affected measures and processes
- Re-training of technicians on proper installation and repair procedures
- Development of job aids for those technicians
- Quality check of SBC splitter equipment in central offices
- Quality reviews check of workmanship
- New checklist completed on each non-ASI order by technician
- Managers in turn follow up with their own check list to verify the technician work

PM65-08, DS1 loop with test access: As with the BRI submeasure, a team is being established to evaluate troubles caused by improper installations with emphasis placed on validating installation test documentation to ensure the proper tests are being performed.

(c) The schedule for those corrective actions to be completed:

- PM 65-03, BRI loop with test access: Team is being formed the week of March 31.
- PM 65-06, DSL loops – line sharing: The corrective action process was implemented in February 2003, and continues, focusing on central office work.
- PM 65-08, DS1 loop with test access: Team is being formed the week of March 31.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 65-03				
December	19323	.53	.23	No
January	21480	.91	.24	No
February	22522	.58	.22	No
PM 65-06				
December	10160	.79	.52	No
January	10137	.94	.74	No
February	10171	1.12	.62	No
PM 65-08				
December	3414	3.25	1.68	No
January	3622	3.59	1.94	No
February	3750	3.17	1.68	No

Issue: Key PMs Requiring Improvement – PM 66-03, Percent Missed Repair Commitments - DSL Line Sharing

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

No specific root cause was identified. Through increased management focus and changes in work prioritization, SBC Illinois has met the parity standard the most recent two months.

(b) The corrective actions being taken for each of those PMs:

For the November results posted on December 20, 2002 corrective action to change the PM implementation was taken: the data sourcing was corrected and the results were subsequently restated for the months June thru October 2002. After review of the results in December, the network teams had a clear vision on the level of disparity and are working to improve performance in the following ways:

- Weekly conference calls with the management team on repair commitment performance
- New daily reports showing performance levels on the affected measures and processes
- Re-training of technicians on proper installation and repair procedures
- Development of job aids for those technicians
- Quality check of SBC splitter equipment in central offices
- Quality reviews check of workmanship
- New checklist completed on each non-ASI order by technician
- Managers in turn follow up with their own check list to verify the technician work

(c) The schedule for those corrective actions to be completed:

The corrective action process was implemented beginning in February. This prioritization, and increased management focus, has resulted in improved performance as shown below.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 66-03				
December	103	18.45%	7.49	No
January	196	6.63%	11.11	Yes
February	130	6.92%	11.39	Yes

As a result of the “passing” performance results reported for the last two months, PM 66-03 will be dropped from this report effective with the next version to be provided to ICC Staff on May 1, 2003.

Issue: Key PMs Requiring Improvement – PM 67-03, Mean Time To Restore - DSL Loops – Line Sharing –Dispatch; and PM 67-18, Mean Time To Restore - DSL Loops – Line Sharing – No Dispatch

SBC Action Plan:

(a) The identified causes of performance that does not meet the parity or benchmark standard:

No specific root cause was identified. Through increased management focus and changes in work prioritization, SBC Illinois has met the parity standard the most recent two months for PM 67-03, and significantly improved wholesale performance on PM 67-18. An additional contributing factor is the location of the splitter for SBC's Affiliate versus CLECs – additional jumpers are required to implement wholesale orders based on the location of the splitter (outside the collocation cage for CLECs versus inside the SBC Affiliate cage).

(b) The corrective actions being taken for each of those PMs:

For the November results posted on December 20, 2002 corrective action to change the PM implementation was taken: the data sourcing was corrected and the results were subsequently restated for the months June thru October 2002. After review of the results in December, the network teams had a clear vision on the level of disparity and are working to improve performance in the following ways:

- Weekly conference calls with the management team on repair commitment performance
- New daily reports showing performance levels on the affected measures and processes
- Re-training of technicians on proper installation and repair procedures
- Development of job aids for those technicians
- Quality check of SBC splitter equipment in central offices
- Quality reviews check of workmanship
- New checklist completed on each non-ASL order by technician
- Managers in turn follow up with their own check list to verify the technician work

(c) The schedule for those corrective actions to be completed:

The corrective action process was implemented beginning in February. This prioritization, and increased management focus, has resulted in improved performance as shown below.

(d) The current and most recent three months of performance results for those measures:

	Wholesale Volume	Wholesale Performance	Standard	Was statistical test passed?
PM 67-03				
December	41	16.31	11.61	No
January	63	12.33	13.82	Yes
February	55	16.09	13.45	Yes
PM 67-18				
December	62	9.34	3.06	No
January	133	4.12	2.93	No
February	75	4.71	2.61	No

As a result of the "passing" performance results reported for the last two months, PM 67-03 will be dropped from this report effective with the next version to be provided to ICC Staff on May 1, 2003.